

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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ROWVAUGHN WELLS, Individually and as  
Administratrix Ad Litem of the Estate of  
TYRE DEANDRE NICHOLS, deceased,

Case No.: 2:23-cv-02224-MSN-atc

**PLAINTIFF’S STATUS REPORT**

*Plaintiff,*

v.

THE CITY OF MEMPHIS, a municipality, *et al.*,

*Defendants.*

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**PLAINTIFF’S STATUS REPORT**

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**COMES NOW** the Plaintiff, RowVaughn Wells, individually and as Administratrix Ad Litem of the Estate of Tyre Deandre Nichols, deceased, (“Plaintiff”), by and through her attorneys of record, and, for her Status Report, as mandated by the Court’s April 10, 2024 Order, the Plaintiff states as follows:

1. On April 10, 2024, this Court entered an Order granting in part and denying in part Plaintiff’s Motion for Leave to Take Thirty-Five Depositions and Conduct Certain Depositions Over Seven Hours. (*See generally* ECF 179). On the subject of depositions for those Rule 30(b)(6) deponents so designated by Defendant City of Memphis (“City Defendants”), in response to Plaintiff’s Rule 30(b)(6) deposition notice, this Court “ordered the City Defendants to communicate [its] Rule 30(b)(6) designations to [Plaintiff] by April 22, 2024,” at which time, counsel would work to resolve any disputes regarding these particular depositions. (*Id.* at p. 2). The Court, further, noted that, by May 6, 2024, Plaintiff was directed to “file a status report indicating whether any issues related to the Rule 30(b)(6) deposition remain[ed] for the Court to resolve.” (*Id.*, at pp. 2-3).
2. On April 22, 2024, pursuant to this Court’s April 10, 2024 Order, counsel for the City Defendants provided a list of Rule 30(b)(6) witness designations responsive to those topics delineated within Plaintiff’s Rule 30(b)(6) deposition notice.

3. On May 6, 2024, an agreement was reached as between the Plaintiff and City Defendants concerning the temporal parameters for City Defendants' Rule 30(b)(6) depositions.
4. Given the agreement referenced above, additional Court intervention for City Defendants' Rule 30(b)(6) depositions is not currently required.

Date: May 6, 2024

Respectfully submitted,  
**ROMANUCCI & BLANDIN, LLC**

/s/ Javier Rodriguez, Jr.

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One of Plaintiff's attorneys

Antonio M. Romanucci (Illinois Bar No. 6190290) (*pro hac vice*)  
Bhavani K. Raveendran (Illinois Bar No. 6309968) (*pro hac vice*)  
Sarah Raisch (Illinois Bar No. 6305374) (*pro hac vice*)  
Javier Rodriguez, Jr. (Illinois and W.D. Tenn. Bar No. 6330351)  
Sam Harton (Illinois Bar No. 6342112) (*pro hac vice*)

**ROMANUCCI & BLANDIN, LLC**

321 N. Clark St., Ste. 900  
Chicago, IL 60654  
+1 (312) 458-1000, *Main*  
+1 (312) 458-1004, *Facsimile*  
[aromanucci@rblaw.net](mailto:aromanucci@rblaw.net)  
[b.raveendran@rblaw.net](mailto:b.raveendran@rblaw.net)  
[sraisch@rblaw.net](mailto:sraisch@rblaw.net)  
[jrodriguez@rblaw.net](mailto:jrodriguez@rblaw.net)  
[sharton@rblaw.net](mailto:sharton@rblaw.net)

David L. Mendelson (Tennessee Bar No. 016812)  
Benjamin Wachtel (Tennessee Bar No. 037986)

**MENDELSON LAW FIRM**

799 Estate Place  
Memphis, TN 38187  
+1 (901) 763-2500 (ext. 103), *Telephone*  
+1 (901) 763-2525, *Facsimile*  
[dm@mendelsonfirm.com](mailto:dm@mendelsonfirm.com)  
[bwachtel@mendelsonfirm.com](mailto:bwachtel@mendelsonfirm.com)

Ben Crump (Wash., D.C. Bar No. 1552623; Tennessee Bar No. 038054)

Chris O'Neal (Florida Bar No. 910201) (*pro hac vice pending*)  
Brooke Cluse (Texas Bar No. 24123034) (*pro hac vice pending*)

**BEN CRUMP LAW, PLLC**

717 D Street N.W., Suite 310

Washington, D.C. 20004

+1 (337) 501-8356 (Cluse), *Telephone*

[ben@bencrump.com](mailto:ben@bencrump.com)

[chris@bencrump.com](mailto:chris@bencrump.com)

[brooke@bencrump.com](mailto:brooke@bencrump.com)

LaShonda Council Rogers (Georgia Bar No. 190276) (*pro hac vice pending*)

**COUNCIL & ASSOCIATES, LLC**

50 Hunt Plaza, SE Suite 740

Atlanta, GA 30303

+1 (404) 526-8857, *Telephone*

+1 (404) 478-8423, *Facsimile*

[lr Rogers@thecouncilfirm.com](mailto:lr Rogers@thecouncilfirm.com)

Earnestine Hunt Dorse (Tennessee Bar No. 012126)

**EARNESTINE HUNT DORSE**

3268 N Waynoka Circle

Memphis, TN 38111-3616

+1 (901) 604-8866, *Telephone*

[ehdorse@gmail.com](mailto:ehdorse@gmail.com)

*Attorneys for Plaintiff, RowVaughn Wells, individually  
and as Administratrix Ad Litem of the Estate of Tyre  
Deandre Nichols, deceased.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on May 6, 2024, they electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Western District of Tennessee by using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

Date: May 6, 2024

Respectfully submitted,  
ROMANUCCI & BLANDIN, LLC

/s/ Javier Rodriguez, Jr.

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One of Plaintiff's attorneys